

REMARKS

This is responsive to the Non-Final Office Action mailed June 13, 2007.

Status of Claims

In view of the amendment above, the status of the claims is:

Prior Art Rejections

Claims 1-31 were rejected under 35 U.S.C. 102(b) as being either anticipated by U.S. Patent No. 6,304,895 to Schneider et al. (Schneider) or as being obvious under 35 U.S.C. 103(a) in view of Schneider and Fishman et al. (2003/0017826). With regard to the rejected claims, applicant respectfully traverses those rejections set forth in Office Action. In addition, applicant has amended the claims in a manner which is believed to clearly overcome the cited prior art.

Applicants have set forth in the amended (claims 1 and 16) a system and method for remotely controlling, through the use of keyboard-video-mouse (KVM) signals, a number of servers (remote devices) without the need for a dedicated switch to make connections between a controlling computer and the remote devices (where KVM signals allow the capability of a server to be remotely controlled and reset). The claimed system and method utilize wirelessly compatible transceivers such that the controlling computers and remote devices can communicate with one another over a peer-to-peer network, whereby KVM monitoring and control is achieved in a more elegant and efficient manner than was possible with systems of the prior art.

As will be described in greater detail below, the claimed system and method are not anticipated by the prior art, since the cited art does not include all of the features of the invention as set forth in the amended claims. Moreover, the claims are also believed to be non-obvious in view of the cited prior art, since even if the references were combined as set forth in the Office Action, the combination would not and could not function in the manner as described and claimed.

With regard to Claims 1 and 16, the system as shown in Fig. 1A of the '895 reference (Schneider) shows a number of target device that couple to KVM type devices through a centralized controller. The target devices additionally couple to the controller

through one or more switches. Without giving further detail, the reference states that the interface between the target controller and the target device may be wireless. (Column 5, lines 34-39.) Based apparently on the above information, the Office Action states that the wireless limitations of these independent claims are anticipated. This is incorrect, however, since the '895 reference does not show first and second wireless transceivers that couple to keyboard video mouse (KVM) interfaces of both the target computer and remote computer. These KVM interfaces in combination with the transceivers properly condition and prepare the KVM signals to be transmitted wirelessly over a distance between the controlling computers and remote devices.

In contrast to the presently claimed invention, the type of wireless interface which is referenced in the '895 patent, can only pertain to a local interface where no conditioning or signal preparation are undertaken to accomplish the wireless transmission. See, for example, column 6, lines 26-28 of the '895 patent which talks about the interface between the controller 50 and the target devices through switch 74 and which states, "[t]he controller 50 includes a video digitizer that receives and converts the analog signals output by connected target device." Since it is known that analog video signals can only travel over short distances before requiring some sort of conditioning, it is clear that the patent is referencing a local interface, thus, the wireless interface reference at column 5 of the patent would necessarily be the same local type interface. Moreover, the type of wireless connection contemplated by '895 must also be the same type single point-to-point connection as would be made through switch 74, since connection is between the same entities, and since no other broadcast type of wireless transmission is mentioned. This, of course, is exactly the type of system that was described in the background of the instant application and over which the present invention provides significant advantages, since the present invention does not utilize a single type switch connection.

Applicants also submit that the independent Claims 1 and 16 are non-obvious and allowable in view of the combination of the Schneider ('895) and Fishman references, since neither Schneider nor Fishman contemplate a connection with interfaces that condition and wirelessly provide KVM signals as does the present invention. In addition, as alluded to above, even if the prior art references were combined as suggested by the Office Action, the combination still would not result in the invention as

claimed, since the proposed combination would still require a centralized controller (and some type of switch) in order to enable transmission of KVM type signals. As mentioned previously, this is exactly the type of system upon which the present invention improves, since the present invention does not require a centralized controller and does necessitate single point-to-point connections. Thus, the combination of the references actually teaches away from the present invention as claimed, since the present invention eliminates significant aspects of the Schneider ('895) reference in order to achieve the same or improved results.

Moreover, the combination of references would also be deficient with respect to the use of the Fishman reference. As is understood, KVM signals allow a remote operator to control and reset a selected server, if necessary. The system of Fishman does not teach or suggest a system that may be utilized to process KVM signals, and the combination of references does not suggest modifications to accomplish that task. At best, the system of Fishman can be said to be providing a form of remote application processing as opposed to system level processing, as is the case with KVM. Accordingly, the Fishman reference is also believed to inapplicable as applied.

With regard to Claims 13 and 17, these claims are additionally believed to be non-obvious in view of the prior art since the system of the present invention allows for automatic updates of a list of available devices that can be monitored and controlled by way of KVM signals without resorting to another mode of operation. This is a significant improvement over the system described in the '895 reference, where the described system, after a period of inactivity, is required to sequentially connect to each of the target devices in order to receive updates.

Claims 14 and 31 are also believed to be non-obvious and allowable in view of the cited prior art, since none of the references either alone or in combination teach or suggest the compressing of video signals in the context of KVM signals prior to wireless transmission thereof.

Independent Claim 23 is additionally believed to be allowable in view of the cited prior art since neither of the references either alone or individually teach or suggest utilizing a wireless network as both an interface to the remote devices to be controlled, as well as to the controlling computer. In addition, Claim 23 allows for automatic

updates of a list of available devices that can be monitored and controlled by way of KVM signals without resorting to another mode of operation.

With regard the remainder of the dependent claims, applicant submits that these claims are allowable based at least on their dependence from independent claims that have previously been shown to be allowable, as well as other novel features included therein.

Based on the above remarks and the amendments to the claims, applicant submits that the claims have been shown to be allowable in view of the prior art and that the basis for any rejections has been overcome.

35 U.S.C. 112, Second Paragraph Rejections

Applicant believes he has addressed those Section 112, second paragraph, rejections that were noted in the Office Action. Accordingly, applicant submits that the basis for those rejections has been overcome.

Conclusion

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding remarks, this application stands in condition for allowance. Accordingly, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, it is respectfully requested that the Examiner contact the applicant's attorney at (215) 446-6268, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Correspondence and Fees

Please charge the Petition for Two Month Extension of Time fee of four hundred and sixty Dollars (\$460.00) to Deposit Account No. 03-3839. No additional fees are believed to be necessitated by the instant response. However, should this be in error, authorization is hereby given to charge Deposit Account no. 03-3839 for any underpayment, or to credit any overpayments.

Please address all correspondence to the correspondent address for **Customer No. 26345 of Intellectual Docket Administrator, Gibbons P.C.**, One Gateway Center, Newark, NJ 07102-5310. Telephone calls should be made to Abhik A. Huq at (215) 446-6268 and fax communications should be sent directly to him at 215-446-6309.

Respectfully submitted,

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